

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

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|-----------------------------|---|----------------|
| UNITED STATES OF AMERICA |) | |
| |) | |
| v. |) | No.: 08 CR 241 |
| |) | |
| |) | |
| JOSE EDUARDO SERRANO- |) | |
| ESPINOZA, |) | Judge Manning |
| ROGELIO SOBERANIS, |) | |
| ROSALIO SOBERANIS, |) | |
| MARIANO LOPEZ, |) | |
| ROBERTO CARLOS SILVA LOPEZ, |) | |
| HECTOR URBINA, |) | |
| REUBEN ROMO |) | |

**GOVERNMENT'S MOTION FOR AN EXTENSION OF TIME
TO RESPOND TO DEFENDANTS' PRETRIAL MOTIONS**

The UNITED STATES OF AMERICA, by its attorney, PATRICK J. FITZGERALD, United States Attorney for the Northern District of Illinois, hereby moves this Court for a one-week extension of time to file a response to defendants' pretrial motions. In support of the Motion for an Extension, the government respectfully states as follows:

1. Defendants' pretrial motions were due on July 11, 2008. The Government's response is due on July 25, 2008. Defendants' replies are due on August 8, 2008.
2. Defendant Reuben Romo filed seven pre-trial motions and defendant Mariano Lopez filed six pre-trial motions, plus adopted Romo's motions. Due to trial preparation in another case, the Government is unable to file a proper response by July 25, 2008. It is essential that the government file a response so that the court can be fully advised on each of these motions.
3. The Government's requested extension of time to file a response, to August 1,

2008, which would then extend the time for defendants' replies to August 15, 2008, will not prejudice defendants or delay trial. The case is set for an initial status before the court at 11:00 a.m. on August 12, 2008, with no trial date set at this time. The one-week extension should not affect a trial date in this case.

4. The undersigned attempted to contact the respective counsel for defendant Romo and defendant Lopez, to determine if either had any objection to this motion. Counsel for Lopez stated that she has no objection to this extension. The government was unable to reach counsel for Romo prior to filing this motion.

WHEREFORE, the Government respectfully requests that the time for filing a response to pretrial motions be extended to August 1, 2008, and the time for defendants to file a reply be set for August 15, 2008.

Respectfully submitted.

PATRICK J. FITZGERALD
United States Attorney

By: /s/ Sheri H. Mecklenburg
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Dated: July 25, 2008

CERTIFICATE OF SERVICE

The undersigned Assistant United States Attorney hereby certifies that the following documents:

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were served on **July 25, 2008**, in accordance with FED. R. CRIM. P. 49, FED. R. CIV. P. 5, LR 5.5, and the General Order on Electronic Case Filing (ECF) pursuant to the district court's system as to ECF filers.

Respectfully submitted.

PATRICK J. FITZGERALD
United States Attorney

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